



November 26, 2018

Via email

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, D.C. 20551

RE: Regulatory Capital Treatment for High Volatility Commercial (HVCRE) Exposures
Docket No. R-1621
RIN 7100-AF-15

Dear Madam:

Western Bankers Association (WBA) supports the Board's proposed amendment to the regulatory capital rule to conform the definition of "high volatility commercial real estate (HVCRE) exposure" to the definition enacted as Section 214 of the Economic Growth, Regulatory Relief and Consumer Protection Act (EGRRCPA) (amending the Federal Deposit Insurance Act (12 U.S.C. §1811)).

WBA supported enactment of EGRRCPA, and believes that the Board's proposed amendment to the regulatory capital rule captures the intent of Section 214 OF EGRRCPA with respect to the treatment of HVCRE.

WBA recommends that the amendment to the regulatory capital rule be adopted as proposed.

Very truly yours,

WESTERN BANKERS ASSOCIATION

By:

A handwritten signature in blue ink, appearing to read 'Martha Evensen Opich', written over a white background.

Martha Evensen Opich
Vice President
Association Counsel